

Kicked off around 09:10. inspection 7/27

This is a "random" inspection in that it's not a "tip/complaint" inspection.

You burn 500,000 lbs of toluene per year.

- Any schedule issues
- Closeout at end of day
- Flow diagram

Ed - has last four years done reporting (2012 - 2015).

2012 he did Tier II.

Skip had done TRI reporting before.

Ed used Skip's format for TRI reporting.

Since 2013, we have used a database that Ed developed.

We manufacture pressure sensitive tape (e.g., scotch tape).

Cook a release line.

We buy adhesive in drums, we mix in drums.

Adhesive is deposited in release paper. Dried ovens - (2 ovens)

3 large production lines &

1 pilot production line.
Everything goes to RTO.
RTO (Regenerative Thermal Oxidizer)

Solvents & VOCs are fed to RTO.

We roll up the tape & convert it in various forms (we don't

4

We coat (liner, fabrics, etc.) film.

-We'll use a wider variety of processes for custom jobs
-aerospace

-We have global customers

-Toluene is main ingredient
pressure sens. adhesives

25% - 65% solids in adhesive drums. monomers

Solvent blends vary based on manufacturer (ethyl acetate, Toluene, n-hexane, isopropanol, acetone).

Pure Toluene in drums used as a diluent.

-We use MEK for cleaning

5

Vinyl acetate is a monomer.

Rascher asked about

Production Ops run

Coating 6-6
6am

Slitting 5am-5pm
5pm-4am

58 employees, 7 employees
7 in FL

35 are production, rest
are admin/mgmt

40,000 square feet

RCRA LQG if air permit

All ops are inside

We don't use water.

6

- Septic
- FTIR Solvent waste for cleaning testing panels
- Flammable wastes
- Adhesives & Solvents come in drums.
- Fuel oil tank out front for heating building.
- RTO part of building heat
- Summer December are slow times
- We use SDS for incoming products
- Mixing happens in drums.
- When we switch adhesives, we clean heads local exhaust & floor sweeps collect fumes
- General

7

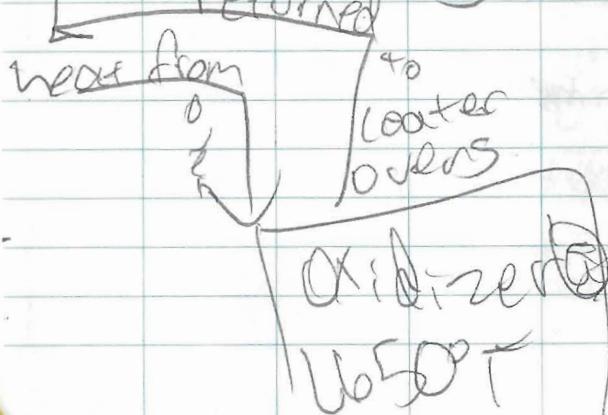
- Sucking fumes from head into oven.
- Fine a couple of years ago went to EC-related fork lifts.
- Hydraulic oil spill by WM provider Compactor for cardboard.
- Empty drums are sealed & put into trailer.
- A couple adhesives have epoxy that will heat up
- We target 1% residual.
- Equipment maintenance.

⁸ Started ~~operating~~ in 2008
all floor drains have
been sealed except

- Safety glasses
- Head is in small enclosure
- . Currently running 6 days per week.

A couple tanks of adhesives a week.

+ Heat recovery of RT



⁹ 5 zones in each
over

PMs on weekly & monthly basis, 1 shut down per year

En

N 2 2,000 gallon
Truck fills it at begin
of week.

Saw materials

We have a day
or
SOS material

10

AeroSet 2420 Adhesive
LOCTITE Duro-Tak 204NA
S8843

- Saw pilote cutter

1 1/2 million BTU burner
on pilot that

heating system for back
end of building

No beam or aisle space
between rows of drums

fire suppression system
w/ CO₂, dry flow w/
whistle sound

- If we exceed 50% LEC a

- If the DTP loses ready signal
the interlock system shuts down

11

the process,
mixing

Exhaust can go to
pilot

Staged empty drums
outside of mix room.
w/ empty drums.

Haz- Storage
wastes in 90/day
Firemaster w/ rags -
Flammable

(Acrylic polymers; solvents
Xylene, Me₂T)

12

We store mixed products

Drums in Hazmat area

- 345N

Loctite Duro-Tak 151A

MEK

- Toluene

Heptane

Loctite Duro-Tak 565

Aerosol PS 6408 Adhesive

- Mixing areas

- We typically change adhesives 5-6 times

- per day & w/ two lines

13

Saw full drum S8843

Pycal 94-LQ-AP

Cooling Room w/
Two production
Coaters

RTO goes into bottle up
mode

Ovens up

Operator records quantities
of adhesive

Rite in the Rain

¹⁴ Saw over lab
hand sheet sampler

: looking for certain
- Saw small propane
Tanks for ~~LE~~
Ed's review

2013-2015 in database

Operators are allocated

X amount of adhesive

Right down Suppliers name,
amount of adhesive,

We physically enter
Adhesive ID

Pilot plant included in
Product Usage Table
Permit Value of 99.5%
Recent

RTO

MSDS prof is just for air
If there is a Syntac
formula w/ diluent, use that
MSDS Constituent

Chemical Regulatory Table
says whether each chemical
is a TRL chemical

Ed showed us report of
all chemicals used directly
for production

Guidance Document
Called Look up Tables

4 drums open + 0
the coating room

O 19
proper ~~test~~ 5 maybe
engineering ~~test~~
Floor Vents are only
in the mixing room,

Floor vents ^{behind} from drums
goes to RTO, other
Floor vents go to outside

Saw table w/ pure salt
Purchased

They wipe

SYNTAC 2015 HAZ Wk

Rags

- Fire retardant
- 1% toluene in rags
- Firemaster BZ-54
- Liquid waste is mostly
from HW drums behind
Cooler

red is input
blue is calculated field
green is a static #

EPICOR - MRP (Inventory)
System

- Stuff cleaned out of
troughs is for toluene

18

- Assumed 5% propene

Look at top 10 chemicals purchased

IFs are mixtures

Used ratio of total lbs to split toluene
b/w different TSDs

Skip Brackbill

Xylene started to trigger
for 2014 brc of

hexane for 2012 for line

1 is different

Xylene & hexane have similar
flow diagrams.

Total product usage is
a proxy

19

2012	2,834,530	lbs
2013	2,895,848	lbs
2014	2,860,193	lbs
2015	2,732,116	lbs

Another product we used
to use had more
toluene & less xylene

Polymer starts

Vinyl acetate 2015	6794.8	lbs
2014	7238	lbs
2013	3073	lbs

20

Heinkel
Purotek: 1070

Ashland Acroset 1910-TH
-52

Vinyl
Acetate

1-5%

1.39%

CK

680

65

total

Roscher
calculated
from two
chemicals

Chris Rya

21

48

- Flow diagrams for last
year for all diagrams
→ SDS for brominated
material

13 isobenzofuro
2196532-53-8

Well request
- 2012 spreadsheets
- 2013 - 2015 obs
- flow diagrams for
2012 & 2015
- MSDS?

MADE IN TACOMA
— SINCE 1916 —

Rite in the Rain®
DEFYING MOTHER NATURE™

Yes, Rite in the Rain
is a wood-based & recyclable
paper, but unlike plain paper...
it won't turn to mush
when exposed to:

USE WET OR DRY
most pens stop writing when wet

- ALL PENCILS
- RITE IN THE RAIN PENS
- WAX MARKERS
- CRAYONS
- OIL PASTELS / PAINT

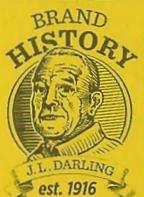
WHEN DRY ONLY
what you write won't wash off

- PERMANENT MARKERS
- STANDARD BALLPOINTS

WON'T WORK
water based inks bead off sheet

- GEL PENS
- MOST HIGHLIGHTERS
- FOUNTAIN PENS
- WATER COLORS
- ACRYLIC PAINT

ALL-WEATHER TOUGH!



The Rite in the Rain story began nearly a century ago in the forests of the Great Northwest. Entrepreneur, Jerry Darling, recognized the logging industry's need for a durable material that could be written on and survive in poor weather conditions. Jerry developed a special coating that created a unique moisture shield on the hand-dipped sheets of paper that he and his wife, Mary, processed at their home. From humble beginnings our first all-weather paper was born! Over the many years we've perfected and patented our environmentally responsible coating process. Still located in Tacoma, our continued mission is to provide innovative products for professionals and enthusiasts who brave the outdoors.

EQUIPPING MULTIPLE INDUSTRIES WORLD-WIDE
{ }
other product styles available



BOUND BOOKS



COVERS, KITS & PLANNERS



LOOSE LEAF & BINDERS



WRITING INSTRUMENTS



PRINTER / COPIER BLANK SHEETS